



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

*Frank O'Bannon*  
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100 North Senate Avenue  
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Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

## **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY**

**Rogers Group, Inc. - Vincennes Asphalt Plant  
1200 South Sixth Street  
Vincennes, Indiana 47591**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 083-14785-03185	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 09, 2002  Expiration Date: August 09, 2007

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary batch mix asphalt plant.

Authorized Individual:	John P. Torres
Source Address:	1200 South Sixth Street, Vincennes, Indiana 47591
Mailing Address:	P.O. Box 25250, Nashville, TN 37202
General Source Phone Number:	(812) 254-0978
SIC Code:	2951
County Location:	Knox
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) batch mixer (AP2) capable of producing 280 tons per hour of asphalt, constructed prior to July 11, 1973, exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.
- (b) One (1) 103.5 million British thermal units per hour natural gas fired aggregate dryer (AP1), constructed prior to July 11, 1973, also exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) 1.35 million British thermal units per hour natural gas-fired heater.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Paved and unpaved roads and parking lots with public access.

- (e) Asbestos abatement projects regulated by 326 IAC 14-10.
- (f) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (g) Three (3) storage tanks, constructed prior to July 11, 1973, including one (1) 20,000 gallon asphalt storage tank (TV2), one (1) 12,500 gallon asphalt storage tank (TV3) and one (1) 15,000 gallon asphalt storage tank (TV4).

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## SECTION B GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking



and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

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IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in

letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as

defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Southwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),  
or

Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Southwest Regional Office telephone No.: 812-436-2570  
Southwest Regional Office facsimile No.: 812-436-2572

Failure to notify IDEM, OAQ / Southwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before

notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

**B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Rogers Group, Inc. - Vincennes Asphalt Plant  
Vincennes, Indiana  
Permit Reviewer: CAP/MES

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Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

**B.19 Operational Flexibility [326 IAC 2-8-15]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and

- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.20 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

**B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.



**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) and F 083-7576-03185, issued on June 20, 1997, fugitive particulate matter emissions shall be controlled according to the plan submitted on December 13, 1996, reviewed, and approved. The plan consists of:

- (a) Cleaning paved roads and parking lots by sweeping on an as needed basis (monthly minimum). Power brooming paved parking lots while wet.
- (b) Paving unpaved roads with asphalt. Treating with emulsified asphalt as needed. Treating with water as needed. Double chipping and sealing the road surface and maintain on an as needed basis.
- (c) Maintaining minimum size and number of stock piles of aggregate. Treating around the stockpile with emulsified asphalt on an as needed basis. Treating around the stockpile with water as needed. Treating the stockpiles with water as needed.
- (d) Applying water at the feed and the intermediate points of the conveyors as needed.
- (e) Minimizing the vehicular distance between transfer points of aggregates. Enclosing the transfer points. Applying water to the transfer points on an as-needed basis.
- (f) Tarping aggregate hauling vehicles. Maintaining vehicle bodies to prevent leakage. Spraying aggregates with water during transport. Maintaining a ten (10) mile per hour speed limit in the yard.
- (g) Reducing free fall distance during loading and unloading of the aggregate. Reducing the rate of discharge of the aggregate. Spraying the aggregate with water on an as needed basis.

**C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

**C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35)

cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

**C.10 Performance Testing [326 IAC 3-6]**

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Compliance Requirements [326 IAC 2-1.1-11]**

**C.11 Compliance Requirements [326 IAC 2-1.1-11]**

---

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

---

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

**C.13 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring,



supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

**C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
within ninety (90) days from the date of issuance of this permit.  
  
The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be

achieved.

- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- 
- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
  - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Stationary Batch Mix Asphalt Plant

- (a) One (1) batch mixer (AP2) capable of producing 280 tons per hour of asphalt, constructed prior to July 11, 1973, exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.
- (b) One (1) 103.5 million British thermal units per hour natural gas fired aggregate dryer (AP1), constructed prior to July 11, 1973, also exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-5-2]

- (a) The VOC solvent used as diluent in the liquid binder used in cold mix asphalt production from the plant shall be limited such that less than 96.5 tons of VOC is emitted per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. This limit shall be achieved by limiting the total VOC solvent of any one selected binder as follows (when more than one binder is used, the formula in paragraph 6 shall be applied):
  - (1) Cutback asphalt rapid cure liquid binder usage shall be limited to less than 96.5 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (2) Cutback asphalt medium cure liquid binder usage shall be limited to less than 131 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (3) Cutback asphalt slow cure liquid binder usage shall be limited to less than 367 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (4) Emulsified asphalt with solvent liquid binder usage shall be limited to less than 197 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (5) Other asphalt with solvent liquid binder shall be limited to less than 3,667 tons of VOC solvent per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (6) The VOC solvent allotments in shall be adjusted when more than one type of binder is used per twelve (12) month consecutive period, with compliance determined at the end of each month. In order to determine the tons of VOC emitted per each type of binder, use the following formula and divide the tons of VOC solvent used for each

type of binder by the corresponding adjustment ratio listed in the table that follows.

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Type of binder	tons VOC solvent	adjustment ratio	tons VOC emitted
cutback asphalt rapid cure		1	
cutback asphalt medium cure		1.36	
cutback asphalt slow cure		3.8	
emulsified asphalt		2.04	
other asphalt		38	

(7) Liquid binders used in the production of cold mix asphalt shall be defined as follows:

- (A) Cut back asphalt rapid cure, containing a maximum of 25.3% VOC solvent by weight in the liquid binder, with 95% by weight of the VOC solvent evaporating.
- (B) Cut back asphalt medium cure, containing a maximum of 28.6% VOC solvent by weight in the liquid binder, with 70% by weight of the VOC solvent evaporating.
- (C) Cut back asphalt slow cure, containing a maximum of 20% VOC solvent by weight in the liquid binder, with 25% by weight of the VOC solvent evaporating.
- (D) Emulsified asphalt with solvent, containing a maximum of 15% VOC solvent by weight in the liquid binder, with 46.4% by weight of the VOC solvent in the liquid blend evaporating. The percent oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
- (E) Other asphalt with solvent binder, containing a maximum 25.9% VOC solvent by weight in the liquid binder, with 2.5% by weight of the VOC solvent evaporating.

(b) Pursuant to 326 IAC 8-5-2, the Permittee shall not allow the use of asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion, except as used for the following purposes:

- (1) penetrating prime coating;
- (2) stockpile storage mix; and

- (3) application during the months of November, December, January, February, and March.

**D.1.2 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-8-4]**

---

- (a) Pursuant to 326 IAC 2-8-4, the total use of natural gas by the dryer burner shall be limited to no more than 707 million cubic feet per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit NO<sub>x</sub> emissions from the use of aggregate dryer burner to 99.0 tons per year and the potential to emit NO<sub>x</sub> from the entire source to less than 100 tons per year. Thus, the requirements of 326 IAC 2-7, Part 70, do not apply.
- (b) The requirement from Condition D.1.1 of FESOP 083-7576-03185, issued on June 20, 1997, which states that the total usage of natural gas shall be limited to 30.3 million cubic feet per month, has been replaced by (a) of this condition which reflects an updated NO<sub>x</sub> emission factor for natural gas combustion. The twelve (12) consecutive month limit also allows the source more flexibility than the monthly limit, while still limiting the potential to emit NO<sub>x</sub> to 99.0 tons per year from the aggregate dryer and ensuring compliance with 326 IAC 2-8-4. Thus, Condition D.1.1 of FESOP 083-7576-03185, issued on June 20, 1997, is hereby rescinded.

**D.1.3 Particulate Matter (PM<sub>10</sub>) [326 IAC 2-8-4]**

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Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from the aggregate dryer and mixer shall not exceed 7.49 pounds per hour, total, equivalent to 32.8 tons per year. This will limit the potential to emit PM<sub>10</sub> from the entire plant to 7.88 pounds per hour and 34.5 tons per year, which is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.

**D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]**

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- (a) Pursuant to 326 IAC 6-3-2(e), Particulate emission limitations, work practices and control technologies, the particulate from the aggregate dryer and mixer shall not exceed 62.2 pounds per hour, total, when operating at a process weight rate of 280 tons per hour. The pound per hour limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) The particulate limit in (a) is revised from the PM limitation for the dryer and mixer of 56.8 pounds per hour in Condition D.1.2 of the initial FESOP (F 083-7576-03185), issued on June 20, 1997, because this source was constructed prior to August 7, 1977, and there were no modifications since that date. Therefore, pursuant to 40 CFR 52.21(i)(4)(i), this source did not require Prevention of Significant Deterioration (PSD) approval, and there are no limitations required to make the requirements of 326 IAC 2-2, PSD, not applicable. Thus, Condition D.1.2 of F 083-7576-03185, issued on June 20, 1997, is hereby rescinded.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for aggregate dryer and batch mixer and any control devices.

**Compliance Determination Requirements**

**D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11] [40 CFR 60.93] [326 IAC 12]**

In order to demonstrate compliance with Conditions D.1.3 and D.1.4, the Permittee shall perform PM and PM<sub>10</sub> testing of the aggregate dryer and mixer stack exhaust (SV1) during the period prior to June 23, 2003, utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing.

**D.1.7 Particulate Matter (PM)**

In order to comply with Conditions D.1.3 and D.1.4, the cyclone (CE2) and scrubber (CE1) shall be in operation at all times when the aggregate dryer and mixer are in operation.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.8 Visible Emissions Notations**

- (a) Visible emission notations of the conveyors, material transfer points and aggregate dryer and mixer stack (SV1) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**D.1.9 Parametric Monitoring**

- (a) The Permittee shall record the total static pressure drop across the cyclone and scrubber combination used in conjunction with the aggregate dryer and mixer, at least once per shift when the aggregate dryer and batch mixer are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the scrubbing liquid (water) flow rate across the scrubber used in conjunction with the aggregate dryer and mixer, at least once per shift when the aggregate dryer and batch mixer are in operation when venting to the atmosphere. When for any one reading, the flow rate is less than the normal range of 630 gallons of water per minute or a

minimum range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A flow rate reading that is below the mentioned value is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instruments used for determining the pressure and flow rate shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### **D.1.10 Scrubber Inspections**

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An inspection shall be performed quarterly of the scrubber controlling the aggregate dryer and batch mixer when venting to the atmosphere. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection.

#### **D.1.11 Scrubber Failure Detection**

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In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **D.1.12 Cyclone Inspections**

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An inspection shall be performed each calendar quarter of the cyclone controlling the aggregate dryer and batch mixer when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

#### **D.1.13 Cyclone Failure Detection**

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **D.1.14 Nonapplicability of Visible Emission Notations for Fugitive Emissions**

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The requirements of Condition D.1.6(b) of FESOP 083-7576-03185, issued on June 20, 1997, which requires that the Permittee perform weekly visible emissions observations on the cyclone, scrubber, scavenger system ductwork and associated components (e.g., hoppers, etc.) for evidence of fugitive emissions, holes, corrosion, audible leaks, and the like, is not incorporated into this permit because the requirements of 326 IAC 6-4 and 326 IAC 6-5 in Section C of this FESOP satisfy the fugitive dust requirements for this source. Therefore, there are no visible emission notation requirements for the fugitive emission points. However, pursuant to Conditions D.1.10 and D.1.8, cyclone and scrubber inspections are required quarterly, and visible emissions notations of the conveyors, material transfer points and stack are required once per shift. Thus, Condition D.1.6(b) of FESOP 083-7576-03185, issued on June 20, 1997, is hereby rescinded.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.15 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain monthly records the amount and VOC content of each solvent used for emulsified and cutback asphalt. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
- (b) To document compliance with Condition D.1.2(a), the Permittee shall keep records of the amount of natural gas used at the aggregate dryer.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of visible emission notations of the conveyors, material transfer points and aggregate dryer and mixer stack (SV1) exhaust once per shift.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain the following for the scrubber and cyclone:
  - (1) Records of the total static pressure drop during normal operation, when venting to the atmosphere, once per shift.
  - (2) Records of the scrubbing liquid (water) flow rate during normal operation, when venting to the atmosphere, once per shift.
  - (3) Documentation of the dates vents are redirected.
- (e) To document compliance with Conditions D.1.10 and D.1.12, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.10 and D.1.12 and the dates the vents are redirected.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) 1.35 million British thermal units per hour natural gas-fired heater.
- (b) Combustion source flame safety purging on startup.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Asbestos abatement projects regulated by 326 IAC 14-10.
- (f) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (g) Three (3) storage tanks, constructed prior to July 11, 1973, including one (1) 20,000 gallon asphalt storage tank (TV2), one (1) 12,500 gallon asphalt storage tank (TV3) and one (1) 15,000 gallon asphalt storage tank (TV4).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no conditions applicable to these insignificant activities.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)  
    (The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
    (The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185  
Facility: Aggregate dryer  
Parameter: Natural gas usage  
Limit: No more than 707 million cubic feet per twelve (12) consecutive month period, with compliance determined at the end of each month, equivalent to no more than 99.0 tons of NO<sub>x</sub> per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	Natural Gas Usage (million cubic feet)	Natural Gas Usage (million cubic feet)	Natural Gas Usage (million cubic feet)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

**Use this form only if only one (1) type of binder is used, or no binder is used in the past 12 months**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185  
Facility: Asphalt Plant  
Parameter: VOC solvent usage per twelve (12) consecutive month period, with compliance determined at the end of each month  
Limit: Cutback asphalt rapid cure liquid binder, less than 96.5 tons VOC solvent usage  
Cutback asphalt medium cure liquid binder, less than 131 tons VOC solvent usage  
Cutback asphalt slow cure liquid binder, less than 367 tons VOC solvent usage  
Emulsified asphalt with solvent liquid binder usage, less than 197 tons VOC solvent usage  
Other asphalt with solvent liquid binder, less than 3,667 tons VOC solvent usage  
Equivalent to VOC emissions of less than 96.5 tons per twelve (12) consecutive month period, excluding combustion

YEAR: \_\_\_\_\_  
TYPE of Binder: \_\_\_\_\_

Month	VOC Solvent Usage (tons)	VOC Solvent Usage (tons)	VOC Solvent Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.  
9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

**Use this form only if more than one (1) type of binder is used in the past 12 months**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185  
Parameter: VOC emissions, excluding combustion, based on solvent usage  
Limit: Less than 96.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, using the following equation:

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Year: \_\_\_\_\_

Month	Type of Liquid binder	Solvent Usage This Month (tons)	Adjustment Ratio	VOC emitted from each binder This Month (tons)	VOC emitted from all binders This Month (tons)	VOC emitted Previous 11 Months (tons)	VOC emitted 12 Month Total (tons)
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				
	Cutback asphalt rapid cure		1				
	Cutback asphalt medium cure		1.36				
	Cutback asphalt slow cure		3.8				
	Emulsified asphalt		2.04				
	Other asphalt		38				

9      Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Rogers Group, Inc. - Vincennes Asphalt Plant  
Source Address: 1200 South Sixth Street, Vincennes, Indiana 47591  
Mailing Address: P.O. Box 25250, Nashville, TN 37202  
FESOP No.: F 083-14785-03185

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**



<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

9      No deviation occurred in this quarter.

9      Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

August 09, 2002

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Name:** Rogers Group, Inc. - Vincennes Asphalt Plant  
**Source Location:** 1200 South Sixth Street, Vincennes, Indiana 47591  
**County:** Knox  
**FESOP:** F 083-14785-03185  
**SIC Code:** 2951  
**Permit Reviewer:** CarrieAnn Paukowits

On July 1, 2002, the Office of Air Quality (OAQ) had a notice published in the Sun Commercial, Vincennes, Indiana, stating that Rogers Group, Inc. - Vincennes Asphalt Plant had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate stationary batch mix asphalt plant with a cyclone and scrubber as controls. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

#### Change 1:

In order to clarify that the VOC solvent in the binder must be limited such that less than 96.5 tons of VOC is emitted per twelve (12) consecutive month period and that compliance for each twelve (12) month period can be demonstrated at the end of each month, the report form used when only one (1) type of binder, or no binder, is used in the previous twelve (12) month period, the limit in the report form used if more than one (1) type of binder is used in the previous twelve (12) month period, and Condition D.1.1 have been revised as follows:

Parameter: VOC solvent usage per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis~~

Limit: Less than 96.5 tons per twelve (12) consecutive month period, **with compliance determined at the end of each month**, using the following equation:

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-5-2]

(a) The VOC solvent used as diluent in the liquid binder used in cold mix asphalt production from the plant shall be limited such that less than 96.5 tons of VOC is emitted per twelve (12) consecutive month period, **with compliance determined at the end of each month**. This will limit the potential to emit VOC from the entire source to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. This limit shall be achieved by limiting the total VOC solvent of any one selected binder as follows (when more than one binder is used, the formula in paragraph 6 shall be applied):

(1) Cutback asphalt rapid cure liquid binder usage shall be limited to less than 96.5 tons

of VOC solvent per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~

- (2) Cutback asphalt medium cure liquid binder usage shall be limited to less than 131 tons of VOC solvent per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~
- (3) Cutback asphalt slow cure liquid binder usage shall be limited to less than 367 tons of VOC solvent per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~
- (4) Emulsified asphalt with solvent liquid binder usage shall be limited to less than 197 tons of VOC solvent per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~
- (5) Other asphalt with solvent liquid binder shall be limited to less than 3,667 tons of VOC solvent per twelve (12) consecutive month period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~
- (6) The VOC solvent allotments in shall be adjusted when more than one type of binder is used per twelve (12) month consecutive period, **with compliance determined at the end of each month** ~~rolled on a monthly basis.~~ In order to determine the tons of VOC emitted per each type of binder, use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio listed in the table that follows.

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Type of binder	tons VOC solvent	adjustment ratio	tons VOC emitted
cutback asphalt rapid cure		1	
cutback asphalt medium cure		1.36	
cutback asphalt slow cure		3.8	
emulsified asphalt		2.04	
other asphalt		38	

- (7) Liquid binders used in the production of cold mix asphalt shall be defined as follows:
  - (A) Cut back asphalt rapid cure, containing a maximum of 25.3% VOC solvent by weight in the liquid binder, with 95% by weight of the VOC solvent

evaporating.

- (B) Cut back asphalt medium cure, containing a maximum of 28.6% VOC solvent by weight in the liquid binder, with 70% by weight of the VOC solvent evaporating.
  - (C) Cut back asphalt slow cure, containing a maximum of 20% VOC solvent by weight in the liquid binder, with 25% by weight of the VOC solvent evaporating.
  - (D) Emulsified asphalt with solvent, containing a maximum of 15% VOC solvent by weight in the liquid binder, with 46.4% by weight of the VOC solvent in the liquid blend evaporating. The percent oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
  - (E) Other asphalt with solvent binder, containing a maximum 25.9% VOC solvent by weight in the liquid binder, with 2.5% by weight of the VOC solvent evaporating.
- (b) Pursuant to 326 IAC 8-5-2, the Permittee shall not allow the use of asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion, except as used for the following purposes:
- (1) penetrating prime coating;
  - (2) stockpile storage mix; and
  - (3) application during the months of November, December, January, February, and March.

#### Change 2:

In order to clarify that the fuel use is limited such that compliance with the fuel use limit for each twelve (12) month period can be demonstrated at the end of each month, the limit in the report form and Condition D.1.2(a) have been revised as follows:

Limit: No more than 707 million cubic feet per twelve (12) consecutive month period, **with compliance determined at the end of each month**, equivalent to no more than 99.0 tons of NO<sub>x</sub> per twelve (12) consecutive month period

#### D.1.2 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-8-4]

- (a) Pursuant to 326 IAC 2-8-4, the total use of natural gas by the dryer burner shall be limited to no more than 707 million cubic feet per twelve (12) consecutive month period, **with compliance determined at the end of each month**. This will limit NO<sub>x</sub> emissions from the use of aggregate dryer burner to 99.0 tons per year and the potential to emit NO<sub>x</sub> from the entire source to less than 100 tons per year. Thus, the requirements of 326 IAC 2-7, Part 70, do not apply.

- (b) The requirement from Condition D.1.1 of FESOP 083-7576-03185, issued on June 20, 1997, which states that the total usage of natural gas shall be limited to 30.3 million cubic feet per month, has been replaced by (a) of this condition which reflects an updated NO<sub>x</sub> emission factor for natural gas combustion. The twelve (12) consecutive month limit also allows the source more flexibility than the monthly limit, while still limiting the potential to emit NO<sub>x</sub> to 99.0 tons per year from the aggregate dryer and ensuring compliance with 326 IAC 2-8-4. Thus, Condition D.1.1 of FESOP 083-7576-03185, issued on June 20, 1997, is hereby rescinded.

**Change 3:**

In order to correctly reflect the wording of 326 IAC 6-3-2, Condition D.1.4 is revised as follows:

**D.1.4 Particulate Matter (PM) [326 IAC 6-3-2]**

- (a) Pursuant to 326 IAC 6-3-2(e), Particulate emission limitations, work practices and control technologies, the **PM particulate** from the aggregate dryer and mixer shall not exceed 62.2 pounds per hour, total, when operating at a process weight rate of 280 tons per hour. The ~~particulate matter (PM)~~ **pound per hour** limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

- (b) The **PM particulate** limit in (a) is revised from the PM limitation for the dryer and mixer of 56.8 pounds per hour in Condition D.1.2 of the initial FESOP (F 083-7576-03185), issued on June 20, 1997, because this source was constructed prior to August 7, 1977, and there were no modifications since that date. Therefore, pursuant to 40 CFR 52.21(i)(4)(i), this source did not require Prevention of Significant Deterioration (PSD) approval, and there are no limitations required to make the requirements of 326 IAC 2-2, PSD, not applicable. Thus, Condition D.1.2 of F 083-7576-03185, issued on June 20, 1997, is hereby rescinded.

August 09, 2002

Indiana Department of Environmental Management  
Office of Air Quality

Technical Support Document (TSD)  
for a Federally Enforceable State Operating Permit (FESOP) Renewal

**Source Background and Description**

<b>Source Name:</b>	<b>Rogers Group, Inc. - Vincennes Asphalt Plant</b>
<b>Source Location:</b>	<b>1200 South Sixth Street, Vincennes, Indiana 47591</b>
<b>County:</b>	<b>Knox</b>
<b>SIC Code:</b>	<b>2951</b>
<b>Operation Permit No.:</b>	<b>F 083-14785-03185</b>
<b>Permit Reviewer:</b>	<b>CarrieAnn Paukowits</b>

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Rogers Group, Inc. - Vincennes Asphalt Plant relating to the operation of a stationary batch mix asphalt plant. Rogers Group, Inc. - Vincennes Asphalt Plant was issued FESOP 083-7576-03185, on June 20, 1997.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) batch mixer (AP2) capable of producing 280 tons per hour of asphalt, constructed prior to July 11, 1973, exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.
- (b) One (1) 103.5 million British thermal units per hour natural gas fired aggregate dryer (AP1), constructed prior to July 11, 1973, also exhausting through a cyclone (CE2) and scrubber (CE1) and exiting through stack SV1.

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

**New Emission Units and Pollution Control Equipment Receiving New Source Review Approval**

There are no new facilities proposed at this source during this review process.

**Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including one (1) 1.35 million British thermal units per hour natural gas-fired heater.
- (b) Combustion source flame safety purging on startup.

- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) Paved and unpaved roads and parking lots with public access.
- (e) Asbestos abatement projects regulated by 326 IAC 14-10.
- (f) A laboratory as defined in 326 IAC 2-7-1(20)(C).
- (g) Three (3) storage tanks, constructed prior to July 11, 1973, including one (1) 20,000 gallon asphalt storage tank (TV2), one (1) 12,500 gallon asphalt storage tank (TV3) and one (1) 15,000 gallon asphalt storage tank (TV4).

### Existing Approvals

FESOP 083-7576-03185, issued on June 20, 1997

All conditions from the previous approval were incorporated into this FESOP except the following:

- (a) Condition D.1.1:

Pursuant to 326 IAC 2-8-4, the total usage of natural gas shall be limited to 30.3 million cubic feet per month. This fuel usage limitation is equivalent to NO<sub>x</sub> emissions of 8.25 tons per month from the entire source. Therefore, 326 IAC 2-7 does not apply.

Reason not incorporated:

The natural gas usage will be limited by this permit to no more than 707 million cubic feet per twelve (12) consecutive month period. This will limit the potential to emit NO<sub>x</sub> to 99.0 tons per year from natural gas combustion, and less than 100 tons per year from the entire source. This limit is revised to rolling twelve (12) month limit to allow for more flexibility, while still making 326 IAC 2-7, Part 70, not applicable. The limit is also revised to reflect updated NO<sub>x</sub> emission factors for natural gas combustion.

- (b) Condition D.1.2:

That pursuant to 326 IAC 6-3-2 (a), particulate matter emissions from the entire asphalt plant shall not exceed 56.8 pounds per hour and particulate matter emissions from the aggregate dryer/mixer shall not exceed 53.2 pounds per hour equivalent to 0.213 grains per dry standard cubic foot. Therefore, PSD requirements (326 IAC 2-2) do not apply.

Reason not incorporated:

Pursuant to 326 IAC 6-3-2, PM from the aggregate dryer and mixer is limited to 62.2 pounds per hour. The limit in the initial FESOP (F 083-7576-03185) was truncated so that the limit also made the source a minor source of PM pursuant to 326 IAC 2-2, PSD. This source was constructed prior to August 7, 1977, and there were no modifications since that date. Therefore, pursuant to 40 CFR 52.21(i)(4)(i), this source did not require Prevention of Significant Deterioration (PSD) approval, and there are no limitations required to make the requirements of 326 IAC 2-2, PSD, not applicable.

(c) Condition D.1.6(b):

That the Permittee shall perform weekly visible emissions observations on the cyclone, scrubber, scavenger system ductwork and associated components (e.g., hoppers, etc.) for evidence of fugitive emissions, holes, corrosion, audible leaks, and the like. This does not require the use of a certified visible emissions reader.

In the event that visible emissions are detected above the limit required by operation condition D.1.3 or any visible emissions are detected on the external cyclone and scrubber components, the Corrective Action Contingency Plan shall be implemented. Corrective action shall be taken within 8 hours of discovery. If the initial corrective action plan does not correct the problem, then additional corrective actions shall be devised within 8 hours of discovery and shall include a timetable for completion. The corrective actions shall be implemented immediately in accordance with those timetables.

Reason not incorporated:

The requirements of 326 IAC 6-4 and 326 IAC 6-5 in Section C of the FESOP satisfy the fugitive dust requirements for this source. Therefore, there are no visible emission notation requirements for the fugitive emission points. However, cyclone and scrubber inspections are required quarterly, and visible emissions notations of the conveyors, material transfer points and aggregate dryer/mixer stack (SV1) are required once per shift.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on August 14, 2001. Additional information was received on November 1 and 27, 2001, and May 6, 2002.

There was no notice of completeness letter mailed to the source.

#### **Emission Calculations**

See pages 1 through 10 of 10 of Appendix A of this document for detailed emissions calculations. This source does use emulsified and/or cutback asphalt. Therefore, the potential to emit VOC from those operations is assumed to be greater than 250 tons per year, based on the VOC content of the binder and maximum throughput.

#### **Unrestricted Potential Emissions**

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that



were contained in the previous FESOP.

<b>Pollutant</b>	<b>Unrestricted Potential Emissions (tons/year)</b>
PM	greater than 250
PM <sub>10</sub>	greater than 250
SO <sub>2</sub>	less than 25
VOC	greater than 250
CO	less than 100
NO <sub>x</sub>	greater than 100, less than 250

Note: For the purpose of determining Title V applicability for particulates, PM<sub>10</sub>, not PM, is the regulated pollutant in consideration.

<b>HAPs</b>	<b>Unrestricted Potential Emissions (tons/year)</b>
Individual	less than 10
TOTAL	less than 25

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub>, VOC and NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, but there is an applicable New Source Performance Standards that was in effect on August 7, 1980. Therefore, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability. However, since paved and unpaved roads are not considered part of the source category according to the NSPS, emissions from paved and unpaved roads are not counted toward determination of PSD and Emission Offset applicability.

#### **Potential to Emit After Issuance**

The source, issued a FESOP on June 20, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F 083-7576-03185, issued on June 20, 1997).

	<b>Potential to Emit After Issuance</b> (tons/year)						
Process/emission unit	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Aggregate dryer and mixer	272	32.8	0.276	2.49 (combustion)	38.1	99.0	less than 10 individual and total
Conveying/handling, Screening, and Storage	42.3	4.30	-	less than 96.5 (emulsified and/or cutback asphalt)	-	-	negligible
Insignificant Activities	0.011	0.045	0.004	1.00	0.497	0.591	negligible
Total PTE After Issuance	315	37.1	0.280	less than 100	38.6	less than 100	Single less than 10 Total less than 25

The PM emissions are limited as indicated under 326 IAC 6-3-2 (Process Operations) in the "State Rule Applicability - Individual Facilities" section of this document. The reasons for the PM<sub>10</sub>, VOC and SO<sub>2</sub> limitations are explained under 326 IAC 2-8-4 (FESOP) in the "State Rule Applicability - Entire Source" section of this document.

#### County Attainment Status

The source is located in Knox County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Knox County has been designated as attainment or unclassifiable for ozone.
- (b) Knox County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### **Federal Rule Applicability**

The following rule applicabilities are still true:

- (a) The batch mix asphalt plant is still not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.90, Subpart I) because the plant was constructed prior to June 11, 1973 and has not been modified.
- (b) The three (3) storage tanks (TV2, TV3, and TV4) are still not subject to NSPS, 326 IAC 12, (40 CFR Parts 60.110, 110a and 110b, Subparts K, Ka and Kb) since they were constructed before the earliest applicability date of June 11, 1973.
- (c) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (d) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

### **State Rule Applicability - Entire Source**

The following rule applicabilities are still true:

#### **326 IAC 2-6 (Emission Reporting)**

This source is located in Knox County and the potentials to emit PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, VOC and CO are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source, constructed prior to August 7, 1977, has a potential to emit more than 250 tons per year of PM. Pursuant to 40 CFR 52.21(i)(4)(i), this source, constructed prior to August 7, 1977, did not require Prevention of Significant Deterioration (PSD) approval. There were no modifications to the source on or after August 7, 1977.

#### **326 IAC 2-8-4 (FESOP)**

Pursuant to this rule, the amount of PM<sub>10</sub>, NO<sub>x</sub> and VOC shall be limited to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) Pursuant to this rule and FESOP 083-7576-03185, issued on June 20, 1997, PM<sub>10</sub> emissions from the aggregate dryer/mixer shall not exceed 7.49 pounds per hour, total, equivalent to 32.8 tons per year. This will limit PM<sub>10</sub> emissions from the entire source to 7.88 pounds per hour, equivalent to 34.5 tons per year, which is less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, do not apply.
- (b) The total use of natural gas by the dryer burner shall be limited to no more than 707 million cubic feet per twelve (12) consecutive month period. This will limit NO<sub>x</sub> emissions from the dryer burner to 99.0 tons per year and the potential to emit NO<sub>x</sub> from the entire source to less than 100 tons per year. Thus, the requirements of 326 IAC 2-7, Part 70, do not apply.
- (c) This source uses emulsified and/or cutback asphalt. Therefore, the unrestricted potential to

emit VOC is greater than 100 tons per year. The VOC solvent used as diluent in the liquid binder used in cold mix asphalt production from the plant shall be limited such that less than 96.5 tons of VOC is emitted per twelve (12) consecutive month period. This will limit the potential to emit VOC, including emissions from combustion, to less than 100 tons per year. The limit shall be achieved by limiting the total VOC solvent of any one selected binder as follows (when more than one binder is used, the formula in paragraph 6 must be applied):

- (1) Cutback asphalt rapid cure liquid binder usage shall be limited to less than 96.5 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.
- (2) Cutback asphalt medium cure liquid binder usage shall be limited to less than 131 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.
- (3) Cutback asphalt slow cure liquid binder usage shall be limited to less than 367 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.
- (4) Emulsified asphalt with solvent liquid binder usage shall be limited to less than 197 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.
- (5) Other asphalt with solvent liquid binder shall be limited to less than 3,667 tons of VOC solvent per twelve (12) consecutive month period rolled on a monthly basis.
- (6) The VOC solvent allotments in shall be adjusted when more than one type of binder is used per twelve (12) month consecutive period rolled on a monthly basis. In order to determine the tons of VOC emitted per each type of binder, use the following formula and divide the tons of VOC solvent used for each type of binder by the corresponding adjustment ratio listed in the table that follows.

$$\frac{\text{Tons of solvent contained in binder}}{\text{Adjustment ratio}} = \text{tons of VOC emitted}$$

Type of binder	tons VOC solvent	adjustment ratio	tons VOC emitted
cutback asphalt rapid cure		1	
cutback asphalt medium cure		1.36	
cutback asphalt slow cure		3.8	
emulsified asphalt		2.04	
other asphalt		38	

- (7) Liquid binders used in the production of cold mix asphalt shall be defined as follows:
  - (A) Cut back asphalt rapid cure, containing a maximum of 25.3% VOC solvent

by weight in the liquid binder, with 95% by weight of the VOC solvent evaporating.

- (B) Cut back asphalt medium cure, containing a maximum of 28.6% VOC solvent by weight in the liquid binder, with 70% by weight of the VOC solvent evaporating.
- (C) Cut back asphalt slow cure, containing a maximum of 20% VOC solvent by weight in the liquid binder, with 25% by weight of the VOC solvent evaporating.
- (D) Emulsified asphalt with solvent, containing a maximum of 15% VOC solvent by weight in the liquid binder, with 46.4% by weight of the VOC solvent in the liquid blend evaporating. The percent oil distillate in emulsified asphalt with solvent liquid, as determined by ASTM, must be 7% or less of the total emulsion by volume.
- (E) Other asphalt with solvent binder, containing a maximum 25.9% VOC solvent by weight in the liquid binder, with 2.5% by weight of the VOC solvent evaporating.

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

#### 326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

This rule requires a fugitive dust plan to be submitted. Pursuant to F 083-7576-03185, issued on June 20, 1997, the plan was submitted, reviewed, and approved. The plan consists of:

- (a) Cleaning paved roads and parking lots by sweeping on an as needed basis (monthly minimum). Power brooming paved parking lots while wet.
- (b) Paving unpaved roads with asphalt. Treating with emulsified asphalt as needed. Treating with water as needed. Double chipping and sealing the road surface and maintain on an as needed basis.

- (c) Maintaining minimum size and number of stock piles of aggregate. Treating around the stockpile with emulsified asphalt on an as needed basis. Treating around the stockpile with water as needed. Treating the stockpiles with water as needed.
- (d) Applying water at the feed and the intermediate points of the conveyors as needed.
- (e) Minimizing the vehicular distance between transfer points of aggregates. Enclosing the transfer points. Applying water to the transfer points on an as-needed basis.
- (f) Tarping aggregate hauling vehicles. Maintaining vehicle bodies to prevent leakage. Spraying aggregates with water during transport. Maintaining a ten (10) mile per hour speed limit in the yard.
- (g) Reducing free fall distance during loading and unloading of the aggregate. Reducing the rate of discharge of the aggregate. Spraying the aggregate with water on an as needed basis.

#### **State Rule Applicability - Individual Facilities**

The following rule applicabilities are still true:

##### **326 IAC 6-3-2 (Particulate emission limitations, work practices and control technologies)**

The asphalt manufacturing operations are subject to 326 IAC 6-3, Particulate Emission Limitations for Manufacturing Processes. Pursuant to 326 IAC 6-3-2(e), Particulate emission limitations, work practices and control technologies, the PM from the aggregate dryer and mixer shall not exceed 62.2 pounds per hour, total, when operating at a process weight rate of 280 tons per hour. The particulate matter (PM) limitation is based on the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The cyclone (CE2) and scrubber (CE1) shall be in operation at all times the aggregate dryer and batch mixer are in operation, in order to comply with this limit.

##### **326 IAC 7 (Sulfur Dioxide Rules)**

This source does not use fuels other than natural gas, and the unrestricted potential to emit SO<sub>2</sub> is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1 are not applicable.

##### **326 IAC 8-5-2 (Asphalt paving rules)**

Although construction of this source commenced prior to January 1, 1980, the source applied for approval after January 1, 1980. Pursuant to 326 IAC 8-5-1(2), the requirements of 326 IAC 8-5-2 are applicable to any asphalt paving application made after January 1, 1980. Pursuant to 326 IAC 8-5-2, the Permittee shall not allow the use of asphalt emulsion containing more than seven percent (7%) oil distillate by volume of emulsion, except as used for the following purposes:

- (a) penetrating prime coating;
- (b) stockpile storage mix; and
- (c) application during the months of November, December, January, February, and March.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The storage tanks at this source are not subject to the requirements of 326 IAC 8-9, Volatile Organic Liquid Storage Vessels, because they are not located in Clark, Floyd, Lake or Porter County.

#### 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd County)

This source is not located in Clark or Floyd counties. Therefore, the requirements of 326 IAC 10-1 are not applicable.

### Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP.

A stack test for PM and PM<sub>10</sub> emissions to determine compliance with 326 IAC 2-8-4 and 326 IAC 6-3-2 was performed on June 23, 1998. This test showed that the asphalt plant is in compliance with its permit requirements.

PM and PM<sub>10</sub> testing is required for the aggregate dryer and mixer stack (SV1) exhaust prior to June 23, 2003, in order to assure compliance with 326 IAC 2-8-4 and 326 IAC 6-3-2.

### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following new compliance requirements were incorporated into this FESOP:

- (a) Visible emission notations of the conveyors, material transfer points and aggregate dryer and mixer stack (SV1) exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are



normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) An inspection shall be performed quarterly of the scrubber controlling the aggregate dryer and batch mixer when venting to the atmosphere. Defective scrubber parts shall be replaced. A record shall be kept of the results of the inspection.

- (c) In the event that a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (d) An inspection shall be performed each calendar quarter of the cyclone controlling the aggregate dryer and batch mixer when venting to the atmosphere. A cyclone inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting to the indoors.

- (e) In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

The compliance monitoring requirements from the initial FESOP, which are still applicable to this source are as follows:

- (a) The Permittee shall record the total static pressure drop across the cyclone and scrubber combination used in conjunction with the aggregate dryer and mixer, at least once per shift when the aggregate dryer and batch mixer are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0 and 4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the scrubbing liquid (water) flow rate across the scrubber used in conjunction with the aggregate dryer and mixer, at least once per shift when the aggregate

dryer and batch mixer are in operation when venting to the atmosphere. When for any one reading, the flow rate is less than the normal range of 630 gallons of water per minute or a minimum range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A flow rate reading that is below the mentioned value is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instruments used for determining the pressure and flow rate shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

These monitoring conditions are necessary because the cyclone and scrubber for the aggregate dryer/mixer must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

All compliance requirements from previous approvals were incorporated into this FESOP except the following:

That the Permittee shall perform weekly visible emissions observations on the cyclone, scrubber, scavenger system ductwork and associated components (e.g., hoppers, etc.) for evidence of fugitive emissions, holes, corrosion, audible leaks, and the like. This does not require the use of a certified visible emissions reader.

In the event that visible emissions are detected above the limit required by operation condition D.1.3 or any visible emissions are detected on the external cyclone and scrubber components, the Corrective Action Contingency Plan shall be implemented. Corrective action shall be taken within 8 hours of discovery. If the initial corrective action plan does not correct the problem, then additional corrective actions shall be devised within 8 hours of discovery and shall include a timetable for completion. The corrective actions shall be implemented immediately in accordance with those timetables.

Reason not incorporated:

The requirements of 326 IAC 6-4 and 326 IAC 6-5 in Section C of the FESOP satisfy the fugitive dust requirements for this source. Therefore, there are no visible emission notation requirements for the fugitive emission points. However, cyclone and scrubber inspections are required quarterly, and visible emissions notations of the conveyors, material transfer points and aggregate dryer/mixer stack (SV1) are required once per shift.

## **Conclusion**

The operation of this stationary batch mix asphalt plant shall be subject to the conditions of the attached proposed FESOP No.: F 083-14785-03185.

## Appendix A: Emission Calculations

**Company Name:** Rogers Group, Inc. - Vincennes Asphalt Plant  
**Plant Location:** 1200 South Sixth Street, Vincennes, Indiana 47591  
**County:** Knox  
**FESOP:** F 083-14785  
**Plt. ID:** 083-03185  
**Date:** August 14, 2001  
**Permit Reviewer:** CarrieAnn Paukowits

### I. Potential Emissions

#### A. Source emissions before controls

##### Hot Oil Heater on Oil (oil/<100MMBTU/uncontrolled)

The following calculations determine the amount of emissions created by #2 & #1 distillate fuel oil @ 0.5 % sulfur, based on 8760 hours of use and AP-42, Tables 1.3-1, 1.3-2, 1.3-3

Pollutant:	<u>0.000 MMBtu/hr * 8760 hrs/yr</u>	<u>* Ef (lbs/1000 gal) = (tons/yr)</u>
	141800.0 Btu/gal * 2000 lbs/ton	
P M:	2.0 lbs/1000 gal =	<u>0.000</u> tons/yr
PM-10	3.3 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	71.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	20.0 lbs/1000 gal =	<u>0.000</u> tons/yr
V O C:	0.34 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	5.0 lbs/1000 gal =	<u>0.000</u> tons/yr

##### Hot Oil Heater on Gas (gas/<100MMBTU/uncontrolled)

The following calculations determine the amount of emissions created by natural gas combustion, based on 8760 hours of use, AP-42 Ch. 1.4, Tables 1.4-1, 1.4-2, 1.4-3

Pollutant:	<u>1.35 MMBtu/hr * 8760 hrs/yr</u>	<u>* Ef (lbs/MMcf) = (tons/yr)</u>
	1000 Btu/cf * 2000 lbs/ton	
P M:	1.9 lbs/MMcf =	<u>0.011</u> tons/yr
P M-10:	7.6 lbs/MMcf =	<u>0.045</u> tons/yr
S O x:	0.6 lbs/MMcf =	<u>0.004</u> tons/yr
N O x:	100.0 lbs/MMcf =	<u>0.591</u> tons/yr
V O C:	5.5 lbs/MMcf =	<u>0.033</u> tons/yr
C O:	84.0 lbs/MMcf =	<u>0.497</u> tons/yr

##### Dryer Burner (gas/<100MMBTU/uncontrolled)

The following calculations determine the amount of emissions created by natural gas combustion, based on 8760 hours of use, AP-42 Ch. 1.4, Tables 1.4-1, 1.4-2, 1.4-3

Pollutant:	<u>0.000 MMBtu/hr * 8760 hrs/yr</u>	<u>* Ef (lbs/MMcf) = (tons/yr)</u>
	1000 Btu/cf * 2000 lbs/ton	
P M:	1.9 lbs/MMcf =	<u>0.0000</u> tons/yr
P M-10:	7.6 lbs/MMcf =	<u>0.000</u> tons/yr
S O x:	0.6 lbs/MMcf =	<u>0.000</u> tons/yr
N O x:	100.0 lbs/MMcf =	<u>0.0000</u> tons/yr
V O C:	5.5 lbs/MMcf =	<u>0.000</u> tons/yr
C O:	84.0 lbs/MMcf =	<u>0.000</u> tons/yr

### Dryer Burner (gas/>100MMBTU/uncontrolled)

The following calculations determine the amount of emissions created by natural gas combustion, based on 8760 hours of use, AP-42 Ch. 1.4, Tables 1.4-1, 1.4-2, 1.4-3

Pollutant:	<b>103.500</b> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/MMcf) (tons/yr)
	1000 Btu/cf * 2000 lbs/ton	
P M:	1.9 lbs/MMcf =	<u>0.861</u> tons/yr
P M-10:	7.6 lbs/MMcf =	<u>3.45</u> tons/yr
S O x:	0.6 lbs/MMcf =	<u>0.272</u> tons/yr
N O x:	280.0 lbs/MMcf =	<u>127</u> tons/yr
V O C:	5.5 lbs/MMcf =	<u>2.49</u> tons/yr
C O:	84.0 lbs/MMcf =	<u>38.1</u> tons/yr

Post-NSPS = 190

### Dryer Burner (gas/>100MMBTU/low nox)

The following calculations determine the amount of emissions created by natural gas combustion, based on 8760 hours of use, AP-42 Ch. 1.4, Tables 1.4-1, 1.4-2, 1.4-3 (low NOx burner = 140, flue gas recirculation = 100)

Pollutant:	<b>0.000</b> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/MMcf) (tons/yr)
	1000 Btu/cf * 2000 lbs/ton	
P M:	1.9 lbs/MMcf =	<u>0.000</u> tons/yr
P M-10:	7.6 lbs/MMcf =	<u>0.000</u> tons/yr
S O x:	0.6 lbs/MMcf =	<u>0.000</u> tons/yr
N O x:	140.0 lbs/MMcf =	<u>0.000</u> tons/yr
V O C:	5.5 lbs/MMcf =	<u>0.000</u> tons/yr
C O:	84.0 lb/MMcf =	<u>0.000</u> tons/yr

### (#2 & #1 oil) Dryer Burner <100

The following calculations determine the amount of emissions created by #2 & #1 distillate fuel oil @ **0.5** % sulfur, based on 8760 hours of use and AP-42, Tables 1.3-1, 1.3-2, 1.3-3

Pollutant:	<b>0.0</b> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/1000 gal) = (tons/yr)
	<b>139000.0</b> Btu/gal * 2000 lbs/ton	
P M:	2.0 lbs/1000 gal =	<u>0.000</u> tons/yr
PM-10:	3.3 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	71.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	20.0 lbs/1000 gal =	<u>0.000</u> tons/yr
V O C:	0.34 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	5.0 lbs/1000 gal =	<u>0.000</u> tons/yr

If Rating >100 mmBtu/hr	
N O x:	<b>24.0</b>
V O C:	<b>0.20</b>

**(#4 oil/ <100MMBTU)**

**Dryer Burner**

The following calculations determine the amount of emissions created by #4 distillate  
fuel oil @ 0.5 % sulfur, based on 8760 hours of use and AP-42, Tables 1.3-1, 1.3-2, 1.3-3

Pollutant:	<u>0.000</u> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/1000 gal) = (tons/yr)
	<u>138000.0</u> Btu/gal * 2000 lbs/ton	
P M:	2.0 lbs/1000 gal =	<u>0.000</u> tons/yr
PM-10:	3.3 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	75.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	20.0 lbs/1000 gal =	<u>0.000</u> tons/yr
V O C:	0.34 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	5.0 lbs/1000 gal =	<u>0.000</u> tons/yr

**(#4 oil/ >100MMBTU)**

**Dryer Burner**

The following calculations determine the amount of emissions created by #4 distillate  
fuel oil @ 0.000 % sulfur, based on 8760 hours of use and AP-42, Tables 1.3-1, 1.3-2, 1.3-3

Pollutant:	<u>0.0</u> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/1000 gal) = (tons/yr)
	<u>0.0</u> Btu/gal * 2000 lbs/ton	
P M:	2.0 lbs/1000 gal =	<u>0.000</u> tons/yr
PM-10:	3.3 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	24.0 lbs/1000 gal =	<u>0.000</u> tons/yr
V O C:	0.20 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	5.0 lbs/1000 gal =	<u>0.000</u> tons/yr

**(waste oil/ vaporizing burner)**

The following calculations determine the amount of emissions created by waste  
fuel oil @ 0.500 % sulfur, based on 8760 hours of use and AP-42, Chapter 1.11

0.000 % Ash  
0.000 % Lead

Pollutant:	<u>0.0</u> MMBtu/hr * 8760 hrs/yr	* Ef (lbs/1000 gal) = (tons/yr)
	<u>0.0</u> Btu/gal * 2000 lbs/ton	
P M:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
P M-10:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	50.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	11.0 lbs/1000 gal =	<u>0.000</u> tons/yr
VOC	1.0 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	1.7 lbs/1000 gal =	<u>0.000</u> tons/yr
Pb:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr

**(waste oil/atomizing burner)**

The following calculations determine the amount of emissions created by waste  
fuel oil @ 0.000 % sulfur, based on 8760 hours of use and AP-42 Chapter 1.11

0.000 % Ash  
0.000 % Lead

Pollutant: 0.000 MMBtu/hr \* 8760 hrs/yr \* Ef (lbs/1000 gal) = (tons/yr)  
0.000 Btu/gal \* 2000 lbs/ton

P M:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
P M-10:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
S O x:	0.0 lbs/1000 gal =	<u>0.000</u> tons/yr
N O x:	16.0 lbs/1000 gal =	<u>0.000</u> tons/yr
VOC	1.0 lbs/1000 gal =	<u>0.000</u> tons/yr
C O:	2.10 lbs/1000 gal =	<u>0.000</u> tons/yr
Pb:	0.00 lbs/1000 gal =	<u>0.000</u> tons/yr

**\*\* aggregate drying: drum-mix plant \*\***

The following calculations determine the amount of emissions created by  
aggregate drying, based on 8760 hours of use and AP-42, Chapter 11.1, Table 11.1-3, rev. 12/00

P M:	28 lbs/ton x	<u>0.0</u> tons/hr x	8760 hrs/yr =	<u>0.000</u> tons/yr
		2000 lbs/ton		
P M-10:	6.5 lbs/ton x	<u>0</u> tons/hr x	8760 hrs/yr =	<u>0.000</u> tons/yr
		2000 lbs/ton		
Lead:	3.3000000000E-06 lbs/ton x	<u>0</u> tons/hr x	8760 hrs/yr =	<u>0.000</u> tons/yr
		2000 lbs/ton		
HAPs:	0.0076 lbs/ton x	<u>0</u> tons/hr x	8760 hrs/yr =	<u>0.000</u> tons/yr
		2000 lbs/ton		

HAPs include benzene, ethylbenzene, formaldehyde, methyl chloroform, naphthalene, toluene, xylene;  
arsenic, cadmium, chromium, manganese, mercury, and nickel compounds.

**\*\* aggregate drying: batch-mix plant \*\***

The following calculations determine the amount of emissions created by  
aggregate drying, based on 8760 hours of use and EPA SCC #3-05-002-05:

P M:	32 lbs/ton x	<u>280</u> tons/hr x	8760 hrs/yr =	<u>39245</u> tons/yr
		2000 lbs/ton		
P M-10:	4.5 lbs/ton x	<u>280</u> tons/hr x	8760 hrs/yr =	<u>5519</u> tons/yr
		2000 lbs/ton		
Lead:	3.3000000000E-06 lbs/ton x	<u>280</u> tons/hr x	8760 hrs/yr =	<u>0.004</u> tons/yr
		2000 lbs/ton		
HAPs:	0.0076 lbs/ton x	<u>280</u> tons/hr x	8760 hrs/yr =	<u>9.32</u> tons/yr
		2000 lbs/ton		

HAPs include benzene, ethylbenzene, formaldehyde, methyl chloroform, naphthalene, toluene, xylene;  
arsenic, cadmium, chromium, manganese, mercury, and nickel compounds.

**\*\* conveying / handling \*\***

The following calculations determine the amount of emissions created by material handling of aggregate, based on 8760 hours of use and AP-42, Ch 11.19.2

$$E_f = .0032 * \frac{(U/5)^{1.3}}{(M/2)^{1.4}} * k = \underline{\underline{0.003}} \text{ lbs/ton}$$

where k = 1 (particle size multiplier)  
U = 12 mph mean wind speed (worst case)  
M = 5.0 % moisture

$$P M : \underline{\underline{0.003}} \text{ lbs/ton} \times \frac{280 \text{ tons/hr}}{2000 \text{ lbs/ton}} \times 8760 \text{ hrs/yr} = \underline{\underline{3.40}} \text{ tons/yr}$$

$$P M-10: 10\% \text{ of PM} = \underline{\underline{0.340}} \text{ tons/yr}$$

**Screening** PM: 280 tons/hr x 0.0315 lbs/ton / 2000 lbs/ton x 8760 hrs/yr = 38.6 tons/yr AP-42 Ch.11.19.2

$$P M-10: 10\% \text{ of PM} = \underline{\underline{3.86}} \text{ tons/yr}$$

**\*\* unpaved roads \*\***

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

**A. Tri-axle Truck**

$$\frac{0.0 \text{ trips/hr} \times 0.00 \text{ miles/roundtrip} \times 8760 \text{ hrs/yr}}{0.0 \text{ miles per year}}$$

**For PM**

**For PM-10**

$$E_f = \{k[(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p)/365]\}$$

= 2.27 lb/mile

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)  
s = 4.8 mean % silt content of unpaved roads  
b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)  
c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)  
W = 38 tons average vehicle weight  
Mdry = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)  
p = 125 number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)

$$\frac{11.24 \text{ lb/mi} \times 0 \text{ mi/yr}}{2000 \text{ lb/ton}} = \text{PM} \underline{\underline{0.00}} \text{ tons/yr}$$

$$\frac{2.27 \text{ lb/mi} \times 0 \text{ mi/yr}}{2000 \text{ lb/ton}} = \text{PM-10} \underline{\underline{0.00}} \text{ tons/yr}$$

11.24  
10  
4.8  
0.5  
0.4  
38  
0.2  
125

# **B. Front End Loader**

0.0 trips/hr x

0.000 miles/roundtrip x

8760 hrs/yr =

0.0 miles per year

**For PM**

**For PM-10**

$$Ef = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p)/365]$$

$$= 2.27 \text{ lb/mile}$$

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)

s = 4.8 mean % silt content of unpaved roads

b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)

c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)

W = 38 tons average vehicle weight

Mdry = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)

p = 125 number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)

$$11.24 \text{ lb/mi x } 0 \text{ mi/yr} = \text{PM } 0.00 \text{ tons/yr}$$

$$2000 \text{ lb/ton}$$

$$2.27 \text{ lb/mi x } 0 \text{ mi/yr} = \text{PM-10 } 0.00 \text{ tons/yr}$$

$$2000 \text{ lb/ton}$$

# **C. Semi Truck**

0.0 trips/hr x

0.0 miles/roundtrip x

8760 hrs/yr =

0.0 miles per year

**For PM**

**For PM-10**

$$Ef = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p)/365]$$

$$= 2.27 \text{ lb/mile}$$

where k = 2.6 (particle size multiplier for PM-10) (k=10 for PM-30 or TSP)

s = 4.8 mean % silt content of unpaved roads

b = 0.4 Constant for PM-10 (b = 0.5 for PM-30 or TSP)

c = 0.3 Constant for PM-10 (c = 0.4 for PM-30 or TSP)

W = 38 tons average vehicle weight

Mdry = 0.2 surface material moisture content, % (default is 0.2 for dry conditions)

p = 125 number of days with at least 0.254mm of precipitation (See Figure 13.2.2-1)

$$11.24 \text{ lb/mi x } 0 \text{ mi/yr} = \text{PM } 0.00 \text{ tons/yr}$$

$$2000 \text{ lb/ton}$$

$$2.27 \text{ lb/mi x } 0 \text{ mi/yr} = \text{PM-10 } 0.00 \text{ tons/yr}$$

$$2000 \text{ lb/ton}$$

# **All Trucking**

Total PM: 0.00 tons/yr

Total PM-10: 0.00 tons/yr



**\*\* storage \*\***

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8760 hours of use and AP-42, Ch 11.2.3.

$$\begin{aligned}
 E_f &= 1.7 \cdot (s/1.5) \cdot (365-p)/235 \cdot (f/15) \\
 &= 1.74 \text{ lbs/acre/day for sand} \\
 &= 1.16 \text{ lbs/acre/day for stone} \\
 &= 1.16 \text{ lbs/acre/day for slag} \\
 &= 1.16 \text{ lbs/acre/day for gravel} \\
 &= 1.16 \text{ lbs/acre/day for RAP} \\
 \text{where } s &= 1.5 \% \text{ silt for sand} \\
 s &= 1.0 \% \text{ silt of stone} \\
 s &= 1.0 \% \text{ silt of slag} \\
 s &= 1.0 \% \text{ silt of gravel} \\
 s &= 1.0 \% \text{ silt for RAP} \\
 p &= 125 \text{ days of rain greater than or equal to 0.01 inches} \\
 f &= 15 \% \text{ of wind greater than or equal to 12 mph}
 \end{aligned}$$

$$\begin{aligned}
 E_p (\text{storage}) &= E_f \cdot sc \cdot (20 \text{ cuft/ton}) \cdot (365 \text{ days/yr}) \\
 &\quad (2000 \text{ lbs/ton}) \cdot (43560 \text{ sqft/acre}) \cdot (25 \text{ ft}) \\
 &= 0.000 \text{ tons/yr for sand} \\
 &= 0.233 \text{ tons/yr for stone} \\
 &= 0.000 \text{ tons/yr for slag} \\
 &= 0.000 \text{ tons/yr for gravel} \\
 &= 0.039 \text{ tons/yr for RAP} \\
 \text{Total PM:} &= \underline{\underline{0.272 \text{ tons/yr}}}
 \end{aligned}$$

$$\begin{aligned}
 \text{where } sc &= \underline{\underline{0}},000 \text{ tons storage capacity for sand} \\
 sc &= \underline{\underline{60}},000 \text{ tons storage capacity for stone} \\
 sc &= \underline{\underline{0}},000 \text{ tons storage capacity for slag} \\
 sc &= \underline{\underline{0}},000 \text{ tons storage capacity for gravel} \\
 sc &= \underline{\underline{10}},000 \text{ tons storage capacity for RAP}
 \end{aligned}$$

$$\begin{aligned}
 \text{P M-10:} \quad 35\% \text{ of PM} &= \underline{\underline{0.000 \text{ tons/yr for sand}}} \\
 35\% \text{ of PM} &= \underline{\underline{0.081 \text{ tons/yr for stone}}} \\
 35\% \text{ of PM} &= \underline{\underline{0.000 \text{ tons/yr for slag}}} \\
 35\% \text{ of PM} &= \underline{\underline{0.000 \text{ tons/yr for gravel}}} \\
 35\% \text{ of PM} &= \underline{\underline{0.014 \text{ tons/yr for RAP}}} \\
 \text{Total PM-10:} &= \underline{\underline{0.095 \text{ tons/yr}}}
 \end{aligned}$$

**Emissions before controls (combustion plus production) are as follows:**

natural gas	#2 oil	#4 oil	waste oil
P M: <u>39288</u> tons/yr	P M: <u>0.000</u> tons/yr	P M: <u>0.000</u> tons/yr	P M: <u>0.000</u> tons/yr
P M-10: <u>5527</u> tons/yr	P M-10: <u>0.000</u> tons/yr	P M-10: <u>0.000</u> tons/yr	P M-10: <u>0.000</u> tons/yr
S O x: <u>0.276</u> tons/yr	S O x: <u>0.000</u> tons/yr	S O x: <u>0.000</u> tons/yr	S O x: <u>0.000</u> tons/yr
N O x: <u>128</u> tons/yr	N O x: <u>0.000</u> tons/yr	N O x: <u>0.000</u> tons/yr	N O x: <u>0.000</u> tons/yr
V O C: <u>2.53</u> tons/yr	V O C: <u>0.000</u> tons/yr	V O C: <u>0.000</u> tons/yr	V O C: <u>0.000</u> tons/yr
C O: <u>38.6</u> tons/yr	C O: <u>0.000</u> tons/yr	C O: <u>0.000</u> tons/yr	C O: <u>0.000</u> tons/yr
Lead: <u>0.004</u> tons/yr	Lead: <u>0.000</u> tons/yr	Lead: <u>0.000</u> tons/yr	Lead: <u>0.000</u> tons/yr
HAPs: <u>9.32</u> tons/yr	HAPs: <u>0.000</u> tons/yr	HAPs: <u>0.000</u> tons/yr	HAPs: <u>0.000</u> tons/yr

This source uses emulsified and/or cutback asphalt. Therefore, the unrestricted potential to emit VOC is assumed to be greater than 250 tons per year and is limited in the permit.

## B. Source emissions after controls

### dryer combustion: gas

P M:	0.86 tons/yr x	<u>0.00201</u> emitted after controls =	<u>0.002</u> tons/yr
P M-10:	3.45 tons/yr x	<u>0.00201</u> emitted after controls =	<u>0.007</u> tons/yr

### dryer combustion: #2 oil

P M:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr
P M-10:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr

### hot oil heater combustion: gas

P M:	0.011 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.011</u> tons/yr
P M-10:	0.045 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.045</u> tons/yr

### hot oil heater combustion: #2 oil

P M:	0.000 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr
P M-10:	0.000 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr

### dryer combustion: #4 oil

P M:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr
P M-10:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr

### dryer combustion: waste oil

P M:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr
P M-10:	0.00 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.000</u> tons/yr

### aggregate drying:

P M:	39244.80 tons/yr x	<u>0.00201</u> emitted after controls =	<u>78.9</u> tons/yr
P M-10:	5518.80 tons/yr x	<u>0.00201</u> emitted after controls =	<u>11.1</u> tons/yr

### conveying/handling:

P M:	3.40 tons/yr x	<u>1.000</u> emitted after controls =	<u>3.40</u> tons/yr
P M-10:	0.34 tons/yr x	<u>1.000</u> emitted after controls =	<u>0.340</u> tons/yr

### screening

P M:	38.63 tons/yr x	<u>1.000</u> emitted after controls =	<u>38.6</u> tons/yr
P M-10:	3.86 tons/yr x	<u>1.000</u> emitted after controls =	<u>3.86</u> tons/yr

### unpaved roads:

P M:	0.00 tons/yr x	50.00% emitted after controls =	<u>0.000</u> tons/yr
P M-10:	0.00 tons/yr x	50.00% emitted after controls =	<u>0.000</u> tons/yr

### storage:

P M:	0.272 tons/yr x	50.00% emitted after controls =	<u>0.136</u> tons/yr
P M-10:	0.095 tons/yr x	50.00% emitted after controls =	<u>0.048</u> tons/yr

Emissions after controls (combustion plus production) are as follows:

	Gas	#2 Oil	#4 Oil	Waste Oil	
P M:	<b>121</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	tons/yr
P M-10:	<b>15.4</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	tons/yr

## II. Allowable Emissions

- A. This source is not subject to NSPS Subpart I.
- B. This source does not use distillate #2 fuel oil and is not subject to 326 IAC 7.
- C. This source does not use waste oil and is not subject to 326 IAC 7.
- D. This source does not use distillate #4 fuel oil and is not subject to 326 IAC 7.

## III. Limited Potential Emissions

### FUEL USAGE LIMITATION: BASED ON NOx

#### FUEL USAGE LIMITATION FOR HOT OIL HEATER ALONE (OIL)

$$\begin{array}{rclclcl}
 0.00 \frac{\text{tons NOx}}{\text{year}} & * & 2000 \frac{\text{lbs}}{\text{ton}} & = & 0.00 \frac{\text{lbs NOx}}{\text{year}} \\
 0 \frac{\text{lbs NOx}}{\text{year}} & / & 20 \frac{\text{lbs NOx}}{\text{kgal}} & = & 0.00 \frac{\text{kgal}}{\text{year}} \\
 0.00 \frac{\text{kgal}}{\text{year}} & * & \frac{99.00 \text{ tons/year}}{0 \text{ tons/year}} & = & 0.0 \frac{\text{gal fuel}}{\text{year}}
 \end{array}$$

#### FUEL USAGE LIMITATION FOR BURNER & HEATER (Gas)

$$\begin{array}{rclclcl}
 128 \frac{\text{tons NOx}}{\text{year}} & * & 2000 \frac{\text{lbs}}{\text{ton}} & = & 255047 \frac{\text{lbs NOx}}{\text{year}} \\
 255047 \frac{\text{lbs NOx}}{\text{year}} & / & 280.0 \frac{\text{lbs NOx}}{\text{MMcf}} & = & 911 \frac{\text{MMcf}}{\text{year}} \\
 911 \frac{\text{MMcf}}{\text{year}} & * & \frac{99.0 \text{ tons/yr}}{128 \text{ tons/yr}} & = & 707 \frac{\text{MMcf}}{\text{year}} & \text{FESOP Limit}
 \end{array}$$

#### FUEL USAGE LIMITATION FOR BURNER & HEATER (#2 Oil)

$$\begin{array}{rclclcl}
 0.00 \frac{\text{tons NOx}}{\text{year}} & * & 2000 \frac{\text{lbs}}{\text{ton}} & = & 0.00 \frac{\text{lbs NOx}}{\text{year}} \\
 0.00 \frac{\text{lbs NOx}}{\text{year}} & / & 20 \frac{\text{lbs}}{1000 \text{ gal}} & = & 0.00 \frac{\text{kgal}}{\text{year}} \\
 0.00 \frac{\text{kgal}}{\text{year}} & * & \frac{99.0 \text{ tons/yr}}{0.00 \text{ tons/yr}} & = & 0.0 \frac{\text{kgal}}{\text{year}} & \text{FESOP Limit}
 \end{array}$$

**FUEL USAGE LIMITATION FOR BURNER (#4 Oil)**

$$\begin{array}{rclclcl}
 0.00 \frac{\text{tons NOx}}{\text{year}} & * & 2000 \frac{\text{lbs}}{\text{ton}} & = & 0.00 \frac{\text{lbs NOx}}{\text{year}} \\
 \\ 
 0.00 \frac{\text{lbs NOx}}{\text{year}} & / & 0.0 \frac{\text{lbs}}{1000 \text{ gal}} & = & 0.00 \frac{\text{kgal}}{\text{year}} \\
 \\ 
 0.00 \frac{\text{kgal}}{\text{year}} & * & \frac{99.0 \text{ tons/yr}}{0.00 \text{ tons/yr}} & = & 0.0 \frac{\text{kgal}}{\text{year}} \text{ FESOP Limit}
 \end{array}$$

**FUEL USAGE LIMITATION FOR BURNER (Waste Oil)**

$$\begin{array}{rclclcl}
 0.00 \frac{\text{tons NOx}}{\text{year}} & * & 2000 \frac{\text{lbs}}{\text{ton}} & = & 0.00 \frac{\text{lbs NOx}}{\text{year}} \\
 \\ 
 0.00 \frac{\text{lbs NOx}}{\text{year}} & / & 0.0 \frac{\text{lbs}}{1000 \text{ gal}} & = & 0.00 \frac{\text{kgal}}{\text{year}} \\
 \\ 
 0.00 \frac{\text{kgal}}{\text{year}} & * & \frac{99.0 \text{ tons/yr}}{0.00 \text{ tons/yr}} & = & 0.0 \frac{\text{kgal}}{\text{year}} \text{ FESOP Limit}
 \end{array}$$

**FUEL USAGE LIMITATION: BASED ON SO2**

The potential to emit SO2 from the entire source is less than 100 tons per year. Therefore, no FESOP limit is required for SO2.